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January 31, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

EXCERPT FROM ORIGINAL

Re: *GN Docket No. 93-252, Implementation of Sections 3(n) and 332 of the Communications Act; Regulatory Treatment of Mobile Services*

Today, Jim Tuthill of Pacific Bell, and Gina Harrison and I of Pacific Telesis met with Gina Keeney, Chief, David Firth, and Dan Phythyon of the Wireless Telecommunications Bureau to discuss issues contained in the attached document which was used during the meeting. Please associate this material with the above-referenced proceeding.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

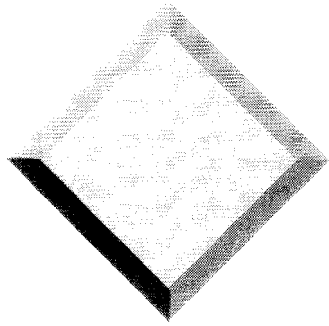
Sincerely,



Attachment

cc: Gina Keeney
David Firth
Dan Phythyon

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BRINGING MOBILITY TO THE MASS MARKET

PACIFIC BELL MOBILE SERVICES

1/31/95

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WE WANT TO BEGIN CONSTRUCTION WHEN AUCTION ENDS

- ❖ ROLLOUT SERVICE QUICKER
- ❖ PROVIDE FASTER COMPETITION TO CELLULAR
- ❖ COMMISSION RULES ALLOW THIS BY PRE-GRANT CONSTRUCTION



COMMISSION SAID SAME RULES APPLY TO ALL CMRS

- ❖ THIRD REPORT AND ORDER 93-252,
PARA. 377
- ❖ SPECIFIC RULES IN PARTS 22 AND
90: 22.143 AND 90.169
- ❖ NEED SPECIFIC RULE FOR PCS
- ❖ COMMISSION SHOULD ISSUE AN
ERRATUM TO PART 24 RULES

COMMISSION SHOULD GRANT WAIVERS IF PROTESTS ARE FILED

- ❖ RULE (22.143(d)) ALLOWS PRE-GRANT CONSTRUCTION PROVIDED NO PETITIONS TO DENY ARE FILED
- ❖ COMMISSION SHOULD GRANT WAIVERS OF THIS RULE
- ❖ PROMOTES FAST ENTRY, COMPETITION, AND SERVICE
- ❖ PCS CARRIERS SHOULD BE ALLOWED TO ASSUME RISK